From: Rosnick, Reid

Sent: Monday, March 10, 2014 11:39 AM

To: Diaz, Angelique

Subject: RE: Declined: EPA/UT Quarterly Rad NESHAPs Call @ Thu Feb 20, 2014 9am - 10am

(pgoble@utah.gov)

Attachments: NESHAP_Subpart-W_NPR-Final_2-21-14.docx

(b) (5) -D lib

From: Diaz, Angelique

Sent: Monday, March 10, 2014 11:31 AM

To: Rosnick, Reid

Subject: FW: Declined: EPA/UT Quarterly Rad NESHAPs Call @ Thu Feb 20, 2014 9am - 10am (pgoble@utah.gov)

Angelique D. Diaz, Ph.D. Environmental Engineer Air Program, USEPA/Region 8 1595 Wynkoop Street (8P-AR) Denver, CO 80202-1129

Office: 303.312.6344 Fax: 303.312.6064 diaz.angelique@epa.gov

From: Phillip Goble [mailto:pgoble@utah.gov]
Sent: Wednesday, February 19, 2014 1:39 PM

To: Diaz. Angelique

Subject: Re: Declined: EPA/UT Quarterly Rad NESHAPs Call @ Thu Feb 20, 2014 9am - 10am (pgoble@utah.gov)

State of Utah position as requested.

NESHAP, Subpart W has the limitation that only two tailings cells can be in *operation* at any given time. The White Mesa Mill has five licensed and permitted tailings cells to receive 11e.(2) byproduct material. However, at the present time there are only two tailings cells in operation. This position is based on the definition of "operation" as found in 40 CFR 61.251(e) as follows:

'Operation means that an impoundment is being used for the continued placement of new tailings or is in standby status for such placement. An impoundment is in operation from the day that tailings are first placed in the impoundment until the day that final closure begins.'

• Tailings Cell 1 - Currently used for liquid management and no tailing have been placed in the cell; therefore, it is not considered operational under NESHAP guidelines.

- Tailings Cell 2 Tailing placement has ceased and a temporary cover has been placed over it. Final closure activities (dewatering) have begun and the cell is no longer active. Tailings Cell 2 must be dewatered and stabilized before final cover is placed.
- Tailings Cell 3 Cell is active. Temporary cover placement has begun and when the cell is full and temporary cover has been placed over the cell, dewatering of the cell will begin.
- Tailings Cell 4A Cell is active.
- Tailings Cell 4B Currently used for liquid management and no tailing have been placed in the cell; therefore, it is not considered operational under NESHAP guidelines.

Therefore, only two tailing cells are currently active and the facility is compliant with NESHAP guidelines.

On Wed, Feb 19, 2014 at 10:04 AM, Diaz, Angelique < <u>Diaz.Angelique@epa.gov</u>> wrote: Phil, I'm sorry you won't be able to make the call. On the agenda is the NOI from Grand Canyon Trust to Energy Fuels. Let me know when you have time to discuss. I'm available today from 1-4pm Monday, 2/24, 7am-11am and 2-3:30pm.

Thanks, Angelique

Angelique D. Diaz, Ph.D. Environmental Engineer Air Program, USEPA/Region 8 1595 Wynkoop Street (8P-AR) Denver, CO 80202-1129

Office: 303.312.6344 Fax: 303.312.6064 diaz.angelique@epa.gov

----Original Appointment----

From: Google Calendar [mailto:calendar-notification@google.com] On Behalf Of Phillip Goble

Sent: Tuesday, February 18, 2014 12:24 PM

To: Diaz, Angelique

Subject: Declined: EPA/UT Quarterly Rad NESHAPs Call @ Thu Feb 20, 2014 9am - 10am (pgoble@utah.gov)

When: Thursday, February 20, 2014 9:00 AM-10:00 AM (UTC-07:00) Mountain Time (US & Canada).

Where: Call In

(b) (6) -Personal

Please send me agenda items by COB 2/18.

Thank you.

When Thu Feb 20, 2014 9am – 10am Mountain Time

Where Call In (map)

Calendar pqoble@utah.gov

• Diaz, Angelique - organizer

Phillip Goble - creator

Rosnick, Reid

· Patefield, Scott

• jpmorris@utah.gov

• Jackson, Scott - optional

Invitation from Google Calendar

Who

You are receiving this courtesy email at the account diaz.angelique@epa qov because you are an attendee of this event.

To stop receiving future notifications for this event, decline this event. Alternatively you can sign up for a Google account at https://www.qoogle.com/calendar/ and control your notification settings for your entire calendar.

<< File: invite.ics >>